



## ***Siloam Springs School District***

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**CC Docket No. 96-45**  
**CC Docket No. 02-6**

**Request for Review**  
**Service Substitution Appeal**

**October 31, 2008**

Siloam Springs School District	<b>Applicant Name</b>
139684	<b>Billed Entity Number</b>
609664	<b>Form 471 Application Number</b>
1680681	<b>Funding Request Number</b>
Rick Jones	<b>Name of Submitter</b>
Technology Coordinator	<b>Title of Submitter</b>
479-524-2400	<b>Phone Number</b>
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The Siloam Springs School District is appealing the Schools and Library Division's (SLD's) to deny the Service Substitution requested by the district. The district requested the SLD allow a service substitution changing the method dial tone was delivered to the district's telephone equipment. The request was to change from POTS lines to a combination of POTS lines and PRI.

We received a letter dated September 5, 2008, stating that our service substitution request had been denied, because Block 14 was checked as Basic Only.

Please consider the following in regard to this matter:

- There is no definition of BASIC PHONE SERVICE in the documentation of Eligible Services. We interpreted it to mean we were not requesting any additional phone service. It was a request with the current vendor to change how the lines are delivered. The PRI and T1 are listed as "Eligible Digital Transmission Services". DID (Direct Inward Dialing) is also listed as eligible "Telephone Service Components".
- The descriptions of Digital Transmission services, Telephone Service, and ITEM 14 refers to phone service. Item 14 states: Check this item if you are seeking support for basic telephone service and/or voice mail only. Basic telephone service is defined as wireline or wireless single line voice service (local, cellular/PCS, and/or long distance) and mandatory fees associated with such

service (e.g., federal and state taxes and universal service fees). We interpreted Basic Phone Service to mean local and long distance service, which is what we still have without additional services.

- There is no request to switch vendors.
- The request still includes the need for POTS lines for fax lines and 911 emergency lines.
- The request would result in substantial savings to the district and a reduction in our erate funding request.
- The technology plan for the Siloam Springs School District which is approved by the Arkansas State Department of Education listed the IP phone system as something we would like to implement as soon as funds allowed. The switch to the PRI is expected to save approximately 2/3 on our phone bill, but we are still offering only local and long distance phone service to the offices and classrooms with the PRI, nothing else. We were paying for approximately 100 individual POTS lines on the old system. (An excerpt is attached.)
- The school district covered the cost of the hardware to actually implement the IP phone system.
- On February 13, 2008, I spoke with an agent and asked several questions about this project. The case number is 21-699699 (Document attached). I specifically asked 'Are IP phones covered as basic phone service even if I switch from POTS to PRI?' The answer was 'Yes'. "Have already filed for 08-09 for POTS. IF we switch to IP system this summer, can I amend my 471, possibly even change vendors?" The answer was "Yes, if you are approved for telecommunication services, IP telephony would be covered."
- We were trying to proceed cautiously after verifying as much as we could to insure that erate funds would not be interrupted. We respectfully request our appeal be approved, and we understand that a reduction in funds will result.
- According to the instructions provided by the SLD, a service substitution must meet the following conditions:
  - The substituted services or products have the same functionality as the services or products contained in the original—the original proposal was for phone service to all offices and classrooms and that did not change.
  - The substitution does not violate any contract provisions or state and local procurement laws, and it does not.
  - The substitution does not result in an increase in the percentage of ineligible services, and it does not. PRI is an approved service. The service is still delivered to eligible locations, for use by eligible users, for educational purposes.
  - The requested change is within the scope of the controlling FCC Form 470, and it is.

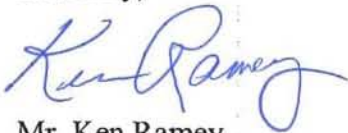
### **Summary**

Our request is with the same vendor for the same local and long distance phone service used by the district but at considerable savings to the district and the Universal Service

Fund. The school district invested considerable funds to make this request possible. The fact that PRI may or may not be classified as Basic Phone Service should not be the grounds for denying this appeal. PRI is an approved service and it is quickly becoming the standard for phone service.

Thank you for your time. If you have any questions, please contact the district's Director of Technology, Rick Jones. He can be reached either by phone, 479-238-3502 or via email at [rick.jones@sssd.k12.ar.us](mailto:rick.jones@sssd.k12.ar.us). I look forward to hearing from you soon.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ken Ramey".

Mr. Ken Ramey  
Superintendent of Schools  
Siloam Springs School District